

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
 :  
 UNITED STATES OF AMERICA :  
 :  
 - v. - :  
 :  
 RAMEL MATTHEWS, :  
 a/k/a "Ra," :  
 WENDELL BELLE, :  
 a/k/a "Delly Dell," :  
 WILLIAM BRACY, :  
 a/k/a "Rel," :  
 KAREEM LANIER, :  
 a/k/a "Black," :  
 a/k/a "Reem," :  
 JASON MOYE, :  
 a/k/a "Tall Jay," :  
 RASHAAD CONYERS, :  
 a/k/a "Houli," :  
 ANDY SEDA, :  
 a/k/a "Andwhite," :  
 a/k/a "Andy Rivera," :  
 JAROD SLATER, :  
 a/k/a "Rod," :  
 DONOVAN REYNOLDS, :  
 a/k/a "Donnie Gz," :  
 HASWANI TYSON, :  
 a/k/a "Swani," :  
 ANTHONY REDDICK, :  
 a/k/a "Ant Flocka," :  
 CHRISTOPHER IVEY, :  
 a/k/a "Light Eyes," :  
 ORENZO HARRELL, :  
 a/k/a "Oey," :  
 SOLOMON ALUKO, :  
 a/k/a "Dodie," :  
 DAVOUN MATTHEWS, :  
 a/k/a "Juice," :  
 DAVAUGHN BROOKS, :  
 a/k/a "Day Day," :  
 a/k/a "Dolla," and :  
 KYLE HINES, :  
 a/k/a "Forty," :  
 :  
 Defendants. :  
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SEALED SUPERSEDING INDICTMENT

S13 15 Cr. 537 (VEC)

 USDC SDNY  
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RACKETEERING VIOLATIONS

COUNT ONE

(Racketeering Conspiracy)

The Grand Jury charges:

1. At all times relevant to this Indictment, RAMEL MATTHEWS, a/k/a "Ra," WENDELL BELLE, a/k/a "Delly Dell," WILLIAM BRACY, a/k/a "Rel," KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," RASHAAD CONYERS, a/k/a "Houli," ANDY SEDA, a/k/a "Andwhite," JAROD SLATER, a/k/a "Rod," DONOVAN REYNOLDS, a/k/a "Donnie Gz," HASWANI TYSON, a/k/a "Swani," ANTHONY REDDICK, a/k/a "Ant Flocka," CHRISTOPHER IVEY, a/k/a "Light Eyes," ORENZO HARRELL, a/k/a "Oey," SOLOMON ALUKO, a/k/a "Dodie," DAVOUN MATTHEWS, a/k/a "Juice," DAVAUGHN BROOKS, a/k/a "Day Day," a/k/a "Dolla," and KYLE HINES, a/k/a "Forty," the defendants, and others known and unknown, were members and associates of the "Young Gunnaz" ("YGz" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, murder, robbery, and narcotics trafficking. The YGz operated principally in the Bronx, New York.

2. The YGz, including its leadership, its membership, and its associates, constituted an "enterprise," as defined by

Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. This Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

PURPOSES OF THE ENTERPRISE

3. The purposes of the Enterprise included the following:

a. Enriching the members and associates of the Enterprise through, among other things, robbery and the distribution of narcotics, including cocaine base in a form commonly known as "crack," heroin, and marijuana.

b. Preserving and protecting the power of the Enterprise and its members and associates through murder, attempted murder, other acts of violence, and threats of violence.

c. Promoting and enhancing the Enterprise and the activities of its members and associates.

d. The Enterprise operated within multiple housing developments, including the Mott Haven Houses, Maria Lopez Plaza, and River Park Towers, all in the Bronx, New York.

MEANS AND METHODS OF THE ENTERPRISE

4. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Enterprise committed, conspired to commit, and attempted to commit, acts of violence, including murder, to protect and expand the Enterprise's criminal operations, and in connection with rivalries with members of other street gangs.

b. Members and associates of the Enterprise used physical violence and threats of violence, including murder and attempted murder, against various people, including in particular rival gang members and rival narcotics traffickers.

c. Members and associates of the Enterprise planned and committed robberies of individuals in and around the Bronx and New York, New York.

d. Members and associates of the Enterprise planned and committed robberies at banks in and around Westchester and Dutchess Counties, in New York State.

e. Members and associates of the Enterprise sold narcotics, including cocaine base in a form commonly known as "crack," heroin, and marijuana.

THE RACKETEERING CONSPIRACY

5. From at least in or about 2005, up to and including in or about August 2016, in the Southern District of New York and elsewhere, RAMEL MATTHEWS, a/k/a "Ra," WENDELL BELLE, a/k/a "Delly Dell," WILLIAM BRACY, a/k/a "Rel," KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," RASHAAD CONYERS, a/k/a "Houli," ANDY SEDA, a/k/a "Andwhite," JAROD SLATER, a/k/a "Rod," DONOVAN REYNOLDS, a/k/a "Donnie Gz," HASWANI TYSON, a/k/a "Swani," ANTHONY REDDICK, a/k/a "Ant Flocka," CHRISTOPHER IVEY, a/k/a "Light Eyes," ORENZO HARRELL, a/k/a "Oey," SOLOMON ALUKO, a/k/a "Dodie," DAVOUN MATTHEWS, a/k/a "Juice," DAVAUGHN BROOKS, a/k/a "Day Day," a/k/a "Dolla," and KYLE HINES, a/k/a "Forty," the defendants, and others known and unknown, being persons employed by and associated with the racketeering Enterprise described above, namely, the YGz, which was engaged in, and the activities of which affected, interstate and foreign commerce, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the YGz through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving murder and robbery that are chargeable under the

following provisions of state law:

New York Penal Law, Sections 20.00, 125.25 and 125.27  
(murder);

New York Penal Law, Sections 20.00, 110.00 and 125.25  
(attempted murder);

New York Penal Law, Sections 105.15 and 125.25  
(conspiracy to murder);

New York Penal Law, Sections 20.00, 110.00, 160.05 and  
160.10 (robbery);

New York Penal Law, Sections 105.10, 160.05 and 160.10  
(conspiracy to commit robbery); and

New York Penal Law, Sections 20.00, 110.00, 160.05 and  
160.10 (attempted robbery);

multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances, including 28 grams and more of cocaine base in a form commonly known as "crack," and quantities of heroin and marijuana, all in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(B), (b)(1)(C), (b)(1)(D), and 846, and Title 18, United States Code, Section 2; and multiple acts that are indictable under Title 18, United States Code, Sections 1951 and 2 (relating to robbery).

6. It was a part of the conspiracy that each defendant



agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Enterprise.

Overt Acts

7. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York or elsewhere:

a. On or about December 22, 2005, a YGz member attempted to shoot a rival of the YGz ("Victim-1") in the vicinity of 286 East 149th Street in the Bronx, New York, and JASON MOYE, a/k/a "Tall Jay," the defendant, and another YGz member, attempted to hide from law enforcement the gun used in the shooting.

b. On or about August 10, 2007, RASHAAD CONYERS, a/k/a "Houli," the defendant, shot and injured an associate of a rival gang ("Victim-2") inside a clothing store in the vicinity of 2838 Third Avenue in the Bronx, New York.

c. On or about June 27, 2009, in the vicinity of Willis Avenue and 140th Street in the Bronx, New York, RAMEL MATTHEWS, a/k/a "Ra," and HASWANI TYSON, a/k/a "Swani," the defendants, and others known and unknown, acting in concert, attempted to commit a robbery, and in the course of doing so, a YGz member shot and killed Darrel Ledgister.

d. On or about September 26, 2009, JASON MOYE, a/k/a "Tall Jay," the defendant, participated in a shootout with members of a rival gang, in the vicinity of East 146th Street and College

Avenue in the Bronx, New York, during which two bystanders ("Victim-3" and "Victim-4," respectively) were shot and injured.

e. On or about October 27, 2009, KYLE HINES, a/k/a "Forty," the defendant, and others known and unknown, acting in concert, robbed a Chinese food delivery worker ("Victim-5") in front of 291 East 143rd Street in the Bronx, New York, and during the course of the robbery, a YGz member cut Victim-5's neck with a sharp object.

f. On or about November 22, 2010, WENDELL BELLE, a/k/a "Delly Dell," WILLIAM BRACY, a/k/a "Rel," JASON MOYE, a/k/a "Tall Jay," the defendants, and others known and unknown, acting in concert, participated in a shootout with members of a rival gang, in the vicinity of East 163rd Street and Park Avenue in the Bronx, New York, during which a rival gang member ("Victim-6") was shot and nearly killed, and BRACY and one of his associates were shot and injured.

g. On or about January 24, 2011, RAMEL MATTHEWS, a/k/a "Ra," KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," ORENZO HARRELL, a/k/a "Oey," and SOLOMON ALUKO, a/k/a "Dodie," the defendants, and others known and unknown, acting in concert, assaulted and robbed an associate of a rival gang ("Victim-7") inside a bodega located on Courtlandt Avenue near 153rd Street in the Bronx, New York.

h. On or about January 24, 2011, WENDELL BELLE, a/k/a



"Delly Dell," RAMEL MATTHEWS, a/k/a "Ra," KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," ORENZO HARRELL, a/k/a "Oey," and SOLOMON ALUKO, a/k/a "Dodie," the defendants, and others known and unknown, acting in concert, assaulted Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets in the Bronx, New York.

i. On or about January 24, 2011, KAREEM LANIER, a/k/a "Black, a/k/a "Reem," the defendant, shot and killed Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets in the Bronx, New York.

j. On or about May 28, 2011, DONOVAN REYNOLDS, a/k/a "Donnie Gz," the defendant, possessed a loaded firearm in the vicinity of Morris Avenue and 143rd Street in the Bronx, New York.

k. On or about December 22, 2011, JASON MOYE, a/k/a "Tall Jay," ANDY SEDA, a/k/a "Andwhite," and JAROD SLATER, a/k/a "Rod," the defendants, and others known and unknown, acting in concert, shot and killed Taisheem Ferguson, a/k/a "Trey," near Morris Avenue and 151st Street in the Bronx, New York.

l. On or about April 16, 2012, WENDELL BELLE, a/k/a "Delly Dell," WILLIAM BRACY, a/k/a "Rell," and ANTHONY REDDICK, a/k/a "Ant Flocka," the defendants, and others known and unknown, acting in concert, stomped and killed Moises Lora, a/k/a "Noah" in the vicinity of 700 Morris Avenue in the Bronx, New York.

m. On or about May 1, 2012, KAREEM LANIER, a/k/a

"Black," a/k/a "Reem," the defendant, hit a drug customer ("Victim-8") with a gun near Maria Lopez Plaza in the Bronx, New York.

n. On or about July 19, 2012, RAMEL MATTHEWS, a/k/a "Ra," and JASON MOYE, a/k/a "Tall Jay," the defendants, and others known and unknown, were together with other YGz gang members in a vehicle containing a loaded firearm, ammunition, and marijuana at a location near the Mott Haven Houses in the Bronx, New York.

o. On or about November 16, 2013, WENDELL BELLE, a/k/a "Delly Dell," the defendant, carried a handgun to a location in the vicinity of East 158th Street and Park Avenue in the Bronx, New York, where co-conspirators not named herein fired several rounds from that handgun and another firearm in an attempt to kill members of a rival gang, resulting in a bystander being shot and injured ("Victim-9").

p. On or about November 26, 2013, WENDELL BELLE, a/k/a "Delly Dell," the defendant, shot and injured an associate of a rival gang ("Victim-10") near the Bronx County Criminal Courthouse in the Bronx, New York.

q. On or about December 22, 2013, DAVOUN MATTHEWS, a/k/a "Juice," the defendant, placed a firearm on the ground by a pillar in a courtyard near 383 East 141st Street in the Bronx, New York and another YGz member picked up the firearm.

r. On or about May 12, 2015, RASHAAD CONYERS, a/k/a "Houli," the defendant, and others known and unknown, acting in

concert, fired gunshots in a rival gang's territory near 328 East 145th Street, Bronx, New York.

s. On or about June 27, 2015, DAVAUGHN BROOKS, a/k/a "Day Day," a/k/a "Dolla," the defendant, approached two members of a rival gang and brandished a firearm in the vicinity of Alexander Avenue between East 142nd and 143rd Streets in the Bronx, New York.

t. On or about August 19, 2015, in an apartment in the Millbrook Houses in the Bronx, New York, ANDY SEDA, a/k/a "Andwhite," the defendant, possessed approximately 92 plastic bags of crack cocaine that he intended to distribute, and possessed hundreds of rounds of ammunition for several types of firearms, including approximately (i) 300 Winchester S&W .40 caliber rounds, (ii) 100 Federal S&W .40 caliber rounds, (iii) one Federal 12-gauge shotgun shell, (iv) one Fiocchi 12-gauge shotgun shell, (v) seven Luger 9mm rounds, (vi) four Winchester .357 caliber rounds, (vii) two Hornaday .357 caliber rounds, (viii) one Federal .357 caliber round, (ix) six Winchester .38 caliber special rounds, and (x) one Federal .38 caliber special round.

u. On or about July 14, 2016, while detained pending trial in this case at the Bureau of Prisons' Metropolitan Detention Center in Brooklyn, New York (the "MDC"), DONOVAN REYNOLDS, a/k/a "Donnie Gz," and KYLE HINES, a/k/a "forty," and others known and unknown, conspired to assault a rival gang member ("Victim-11") with a dangerous weapon (namely, what appeared to be a scalpel) in

Victim-11's jail cell at the MDC and to steel commissary items from Victim-11's jail cell.

**NOTICE OF SPECIAL SENTENCING FACTORS**

8. On or about June 27, 2009, in the Southern District of New York, RAMEL MATTHEWS, a/k/a "Rah," and HASWANI TYSON, a/k/a "Swani," the defendants, and others known and unknown, knowingly murdered and aided and abetted the murder of Darrel Ledgister in the vicinity of 401 East 140th Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, RAMEL MATTHEWS and TYSON caused the death of Ledgister, and (ii) under circumstances evincing a depraved indifference to human life, RAMEL MATTHEWS and TYSON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Ledgister, and (iii) RAMEL MATTHEWS and TYSON, acting in concert, attempted to commit a robbery, and in the course of and in furtherance of such attempted robbery, caused the death of Ledgister.

9. On or about January 24, 2011, in the Southern District of New York, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, knowingly murdered Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets, Bronx, New York, in violation of New York Penal Law, Section 125.25, in that, (i) with intent to cause the death of Etheridge, LANIER caused the

death of Etheridge, and (ii) under circumstances evincing a depraved indifference to human life, LANIER recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Etheridge.

10. On or about December 22, 2011, in the Southern District of New York, JASON MOYE, a/k/a "Tall Jay," ANDY SEDA, a/k/a "Andwhite," and JAROD SLATER, a/k/a "Rod," the defendants, and others known and unknown, knowingly murdered and aided and abetted the murder of Taisheem Ferguson, a/k/a "Trey," in the vicinity of Morris Avenue and 151st Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of another person, MOYE, SEDA, and SLATER caused the death of Ferguson, and (ii) under circumstances evincing a depraved indifference to human life, MOYE, SEDA, and SLATER recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Ferguson.

11. On or about April 16, 2012, in the Southern District of New York, WENDELL BELLE, a/k/a "Delly Dell," WILLIAM BRACY, a/k/a "Rel," and ANTHONY REDDICK, a/k/a "Ant Flocka," the defendants, and others known and unknown, knowingly murdered and aided and abetted the murder of Moises Lora, a/k/a "Noah," in the vicinity of 700 Morris Avenue, Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with



intent to cause the death of Lora, BELLE, BRACY, and REDDICK caused the death of Lora, and (ii) under circumstances evincing a depraved indifference to human life, BELLE, BRACY, and REDDICK recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Lora.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO

**(Murder of Darrel Ledgister in Aid of Racketeering)**

The Grand Jury further charges:

12. At all times relevant to this Indictment, the YGz, as described in Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

13. At all times relevant to this Indictment, the YGz, through its members and associates, knowingly engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts



involving murder and robbery, in violation of New York Penal Law, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and robberies and attempted robberies of banks, in violation of Title 18, United States Code, Sections 1951 and 2.

14. On or about June 27, 2009, in the Southern District of New York, RAMEL MATTHEWS, a/k/a "Rah," and HASWANI TYSON, a/k/a "Swani," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the YGz, and for the purpose of gaining entrance to and maintaining and increasing position in the YGz, an enterprise engaged in racketeering activity, as described above, knowingly murdered and aided and abetted the murder of Darrel Ledgister in the vicinity of 401 East 140th Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, RAMEL MATTHEWS and TYSON caused the death of Ledgister; and (ii) under circumstances evincing a depraved indifference to human life, RAMEL MATTHEWS and TYSON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Ledgister; and (iii) RAMEL MATTHEWS and TYSON, acting in concert, attempted to commit a robbery, and in the course of